

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS)	
LICENSING & DEVELOPMENT,)	Case No. 6:20-cv-00572-ADA
)	
<i>Plaintiff,</i>)	Case No. 6:20-cv-00580-ADA
)	
v.)	Case No. 6:20-cv-00584-ADA
)	
GOOGLE LLC,)	Case No. 6:20-cv-00585-ADA
)	
<i>Defendant.</i>)	JURY TRIAL DEMANDED
)	

JOINT MOTION TO ENTER AMENDED SCHEDULING ORDER

On May 4, 2023, the Court informed the parties via email that the Court was no longer available to conduct trial on the July 31, 2023, date previously scheduled in this matter. The Court then proposed to reset trial to one of the weeks of July 24, August 7, or August 14, and directed the parties to meet and confer. The parties have duly met and conferred since the Court's order. Between the several experts involved in these cases and counsel's other scheduling commitments, the parties are unfortunately unavailable for any of the three weeks proposed by the Court.

But the parties have determined that the week of August 21 should accommodate all involved persons' respective conflicts. The parties thus request that the Court consider resetting trial to a date outside the options originally proposed, and to that end file this Joint Motion to Enter an Amended Scheduling Order. The parties' agreed proposed amended case schedule is attached.

The parties further advise the Court of additional scheduling-related discussions, stemming from these four cases' involvement of four unrelated patent families, subject technologies, accused

products, damages models, and testifying experts. Barring a trial of far greater duration than the Court typically orders, it will be nearly impossible to effectively educate a jury on four distinct sets of issues in the span of a single trial.

To that end, the parties propose that the date indicated for trial below be designated for the 580 and 585 Cases, and that the 572 and 584 Cases be tentatively set for trial approximately 6-10 weeks thereafter. In the event that the Court's pretrial rulings render one or both of the 580 and 585 Cases unable to proceed to trial, then the parties will submit a revised proposal shortly after the final pretrial conference concerning which two cases shall be tried on the first trial date.

The parties stand ready to appear should that assist the Court.

Date: May 12, 2023

Respectfully submitted,

/s/ Joseph M. Abraham

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of May, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which served a copy via email to all counsel of record.

/s/ Joseph M. Abraham
Joseph M. Abraham

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(G), counsel for Brazos conferred with counsel for Google regarding the subject of this motion, and the parties are agreed.

/s/ Joseph M. Abraham
Joseph M. Abraham